

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

13 Attorneys for SAMSUNG ELECTRONICS
 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 Pursuant to Civil L.R. 7-11 and 79-5, and General Order No. 62, Defendants Samsung
2 Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
3 America, LLC (collectively, "Samsung") hereby bring this administrative motion for an order to
4 seal:

- 5 1. Samsung's Notice of Motion and Motion to Compel Production of Materials From
6 Related Proceedings and to Enforce December 22, 2011 Court Order ("Samsung's
7 MTC");
- 8 2. Declaration of Diane C. Hutnyan in Support of Samsung's Motion to Compel
9 Production of Materials From Related Proceedings and to Enforce December 22,
10 2011 Court Order ("Hutnyan Declaration"); and
- 11 3. Exhibits B-D and N to the Hutnyan Declaration.

12 The above items contain materials that Apple, Inc. ("Apple") has designated as
13 confidential under the protective order entered in this case. Samsung expects that Apple will file
14 a declaration establishing good cause to permit the sealing of these materials pursuant to Civil
15 Local Rule 79-5(d). In addition, the above items contain materials previously filed under seal.

16 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court
17 for in camera review and served on all parties. Proposed redacted versions of Samsung's MTC
18 and the Hutnyan Declaration are attached as Exhibits 1-2 to this motion.

19 DATED: March 6, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

22 By /s/ Victoria Maroulis

23 Charles K. Verhoeven

24 Kevin P.B. Johnson

25 Victoria F. Maroulis

26 Michael T. Zeller

27 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC